

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

**MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS**

AND NOW, comes the defendant, Krasimir Nikolov, by his attorney, Jay J. Finkelstein, Assistant Federal Public Defender, and respectfully files this Motion to Extend Time for Filing Pretrial Motions. In support thereof, counsel states:

1. The defendant, Krasimir Nikolov, was arraigned on an Indictment alleging violations of Title 18, U.S.C. §§371, 1030(a)(2)(A), 1030(c)(2)(B)(i), 1344 and 2.

2. Pursuant to Local Rule 12 and Federal Rule of Criminal Procedure 45(a), certain pretrial motions are due on October 10, 2017.

3. Plea negotiations are ongoing and additional time is needed to complete said negotiations.

4. Counsel for Mr. Nikolov hereby moves this Court for an extension of time of 45 days within which to file pretrial motions. Such an extension of time for filing pretrial motions would result in a new due date of November 24, 2017.

5. The United States, through Assistant United States Attorney Charles Eberle, does not object to the granting of this motion.

WHEREFORE, the defendant, Krasimir Nikolov, requests that the motion to extend time for filing pretrial motions be granted, and that the time for filing such motions be extended for 45 days to November 24, 2017.

Respectfully submitted,

*s/ Jay J. Finkelstein*

Jay J. Finkelstein  
Assistant Federal Public Defender  
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